



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Jacob K. Javits Federal Building  
26 Federal Plaza  
New York, New York 10278*

July 29, 2025

**By ECF**

The Honorable Jennifer L. Rochon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Keith Taylor*, 24 Cr. 524 (JLR)**

Dear Judge Rochon:

The Government respectfully writes to inform the Court that a superseding indictment was returned by the grand jury today and docketed as S2 24 Cr. 524 (JLR) (the “S2 Superseding Indictment”). The S2 Superseding Indictment has the following principal changes: (1) expands the time frame of the wire fraud and aggravated identity fraud offenses charged in Counts One and Two through June 2025; (2) adds the penalty provision under 18 U.S.C. § 3147 for committing Counts One and Two while the defendant was on release pending trial; and (3) adds charges of tax evasion for the tax years 2023 and 2024.

The filing of the S2 Superseding Indictment will not necessitate the production of any additional discovery. The Government has no objection to the Court proceeding with the arraignment on the S2 Superseding Indictment at the next scheduled pretrial conference.

Respectfully submitted,

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cc: (by ECF)

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